



OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued: DRAFT

Permit Number:
455142

Date Expires: DRAFT

Issued To:
Vistawall Division of Butler Manufacturing Company, Inc.

Installation Address:
920 Pottertown Road
Midway

Installation Description:
Aluminum Product Manufacturer: Consisting of source 03,
anodizing line, paint line and associated coating operations

Emission Source Reference No.:
30-0177-00

Insignificant Activities:
Aluminum extrusion lines 1 & 2

CONDITIONAL MAJOR SOURCE

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

1. The application(s) that were utilized in the preparation of this permit are dated May 30, 2000, and January 18, 2002, and signed by Mr. John Tolson, Plant Manager of the permitted facility. If this person terminates his/her employment or is reassigned different duties such that he/she is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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DRAFT _____
TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON TRANSFERABLE

POST AT INSTALLATION ADDRESS

Section I -- The following conditions shall apply to all sections of this permit unless otherwise noted.

2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The permittee would be considered a major source because their “potential to emit” value(s) for a single hazardous air pollutant (HAP), a combination of hazardous air pollutants (HAPs), and volatile organic compounds (VOCs) were greater than 10 tons, 25 tons, and 100 tons per year respectively, at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability threshold for single HAP, any combination of HAPs, and VOCs of 10, 25, and 100 tons per year, respectively.
3. Any non compliance with any condition(s) of this permit set to restrain the “potential to emit” below the applicability thresholds of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within fifteen working days of such discovery. This notification, at a minimum, shall include the identification of the source(s), identification of the permit condition(s) violated and details of the non-compliance (violation).
4. The Permittee is placed on notice that Conditions 8 and 9 of this operating permit contain limitations that allow the Permittee to opt out of the major source operating permit program requirements specified in Division Rule 1200-3-9-.02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.
5. A report stating the compliance status of this facility with permit Conditions 8 and 9 shall be submitted by March 31 of every year. This report shall cover the preceding calendar year and shall include the records required by Condition 10. This report shall be mailed to the following address:

Tennessee Division of Air Pollution Control
Johnson City Environmental Assistance Center
2305 Silverdale Road
Johnson City, Tennessee 37601

6. Should proof of compliance for the pollutant with emission limitations placed on this permit be required, the emissions measuring test method(s) and procedures are the following:

Pollutant or Parameter	Testing Methodology
Particulate Matter	EPA Method 5 as published in the current 40 CFR 60, Appendix A
Volatile Organic Compound Content of Process Materials	EPA Method 24 as published in the current 40 CFR 60, Appendix A
Hazardous Air Pollutant Content of Process Materials	EPA Method 311 as published in the current 40 CFR 63, Appendix A
Visible Emissions	EPA Method 9 as published in the current 40 CFR 60, Appendix A

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7. The as-supplied VOC content of all VOC-containing materials and the as-supplied HAP content of all HAP-containing materials to be used by all sources at this facility shall be determined from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data, which explicitly list the VOC and the HAP content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format, which readily provides the same required information. This table, along with MSDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative.

Material Name*	Density (lb/gal)	VOC Content (lb/gal)	HAP #1* Content (lb/gal)	HAP #2 Content (lb/gal)	Total HAP Content (lb/gal)

* This table may be expanded to include additional materials and HAPs as required.

8. VOC emitted from this source shall not exceed a maximum of 99.0 tons during all intervals of 12 consecutive months.

Compliance with this condition may be demonstrated by the records required by Condition 10.

This condition is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations, and the information contained in the agreement letter dated April 30, 2004, by the permittee.

9. HAP emitted from this source shall not exceed a maximum of 9.9 tons for a single HAP and 24.9 tons for any combination of HAP, during all intervals of 12 consecutive months.

Compliance with this condition may be demonstrated by the records required by Condition 10.

This condition is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations, and the information contained in the agreement letter dated April 30, 2004, by the permittee.

10. The Permittee shall maintain records of the quantities of VOC-containing materials used, the quantities of HAP-containing materials used, the quantities of VOC emitted and the quantities of HAP emitted from this facility. The permittee shall apply the appropriate capture and destruction efficiency when calculating emissions of HAPS and/or VOCs. These records shall be kept in the format shown in the following tables or an alternative format, which readily provides the same required information. These records must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These records must be retained for a period of not less than five (5) years.

LOG 1 – MONTHLY VOC (volatile organic compounds) LOG FOR 30-0177

YEAR AND MONTH: _____						
Material Name*	Usage (gal)	Density (lb/gal)	VOC Content (weight %)	Capture Efficiency (%)	Oxidizer Destruction Efficiency (%) **	VOCs Emitted (tons)
Clean-up solvents						
TOTALS						

* This table may be expanded to include additional materials and HAP as required.

** When the oxidizer is not operating and the source is still operating the efficiency of the oxidizer will equal zero.

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YEAR AND MONTH: _____						
Material Name*	Usage (gal)	Density (lb/gal)	HAP 1 Content (weight %)	Capture Efficiency (%)	Oxidizer Destruction Efficiency (%) **	HAP #1 Emitted (tons)
Clean-up solvents						
TOTAL						

** When the oxidizer is not operating and the source is still operating the efficiency of the oxidizer will equal zero.

[illegible]

* This table may be expanded to include additional HAP as required. ** The Tons per 12 Months value is the sum of the VOC (or single HAP or Total HAP) emissions in the 11 months preceding the month just completed + the VOC (or single HAP or Total HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

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11. Excess emissions shall be addressed as specified in Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.
12. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control devices. Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years.
13. Visible emissions from all exhaust stacks shall not exceed 20 percent opacity (6 minute average) as determined by EPA Method 9 as specified in the current 40 CFR Part 60, Appendix A.
14. This permit supersedes any previous permits for this facility.
15. The Permittee shall apply for renewal of this permit not less than 60 days prior to the permit's expiration date pursuant to Division Rule 1200-3-9-.02 (3).

Section II -- Source specific conditions.

30-0177-03 -- Paint Booths 1-8 controlled by an oxidizer, brand name Roxidizer, with a dryer oven (Booths 5 & 6 are hand spray) paint line room is the partial enclosure for this source

16. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet (3.84 pound per hour.)

This emission limitation is established pursuant to Rule 1200-3-7-.04(1) of the Tennessee Air Pollution Control Regulations.

Compliance with this requirement shall be assured by operating the roll-up filter for each paint booth at all times when the source is in operation and by maintaining maintenance records as indicated in Condition 13.

17. This process includes a thermal oxidizer, which is used to reduce emissions of VOCs and HAPs. The destruction efficiencies noted in Condition 20 are dependent on the proper operation of the oxidizer. Proper operation of the oxidizer shall be assured by maintaining a minimum operating temperature of 1400 °F.

Compliance with this condition shall be assured by recording the oxidizer operating temperature once per day when this source is in operation. These records must be retained for a period of not less than five years. Maintenance records must be maintained as indicated in Condition 12.

18. The stated design heat input capacity for the oxidizer shall not exceed 2.7 MMBtu/hr. The Technical Secretary may require the permittee to prove compliance with this rate.
19. Natural gas and/or propane only shall be used as fuel(s) for this source.
20. The destruction and capture efficiency to be used for determining VOC and HAP emissions recorded in Condition 10, Logs 1 & 2 are:

<u>Compound</u>	<u>Capture Efficiency</u>	<u>Destruction Efficiency</u>
Volatile organic compounds	77.5 %	99.4 %
Hazardous air pollutants	77.5 %	99.4 %

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21. The paint line room which encloses the coating line controlled by the thermal oxidizer shall meet the following criteria to meet the requirements for partial enclosure and assure 77.5 % capture of VOCs and/or HAPS being sent to the control device:
- Access doors and windows of the paint line room shall remain closed during routine operation similar to the test conditions referenced in report titled "Paint Line Room Permanent Total Enclosure Capture Efficiency Evaluation" dated November 26, 2002.
 - Air flow through natural draft openings (NDO) shall be at least 150 feet per minute (fpm) average for all NDO based on a daily average, with a verification of continuous flow into the enclosure.
 - Source(s) of VOC shall be at least 72 feet away from NDO.
22. VOC or HAP containing cleaning solvents used around the source shall be recorded in Condition 10, Logs 1 & 2. The VOC and HAP emission from cleaning solvents will be 100 % of the total respective content.
23. When the oxidizer is not operating and materials are still being coated in the paint booths, all VOC and HAP emissions from coating materials must be recorded with a destruction efficiency of zero.

30-0177 -- Anodizer tanks 1-3 and scrubbers identified by emission points AA1 & AA2

24. The anodizing scrubbers shall be operating at all times when the associated process is in operation. Operation of the scrubber(s) shall be maintained until all emissions from the associated process(es) have completely ceased.

30-0177-04 -- Etch tank and desmut tank with scrubbers identified by emission point AE-1 (60,000 cfm)

25. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet (10.3 pound per hour.)

This emission limitation is established pursuant to Rule 1200-3-7-.04(1) of the Tennessee Air Pollution Control Regulations.

Compliance with this requirement is inherent in the process.

26. The etch scrubber shall be operating at all times when the associated process is in operation. Operation of the scrubber(s) shall be maintained until all emissions from the associated process(es) have completely ceased.

30-0177 -- Main building ventilation through paint roof ventilator (PFUGI) fugitives from hand cleanup and paint prewash tanks

27. The Hydrogen Fluoride (HF) gas emitted from the exhaust of the acid clean tank (PFUG1) shall not exceed 0.185 pounds per hour (lb./hr.), on a 24-hour averaging basis.

Compliance with this requirement is inherent in the process.

28. The exhaust gases from the acid tank (PFUG1) shall be discharged unobstructed vertically upwards to the ambient air from a stack with an exit diameter of three feet eight inches (3' 8"), not less than thirty-five (35') feet above ground level.

30-0177- – Paint kitchen

29. VOC or HAP containing cleaning solvents used around the source shall be recorded in Condition 10, Logs 1 & 2. The VOC and HAP emission from cleaning solvents will be 100 % of the respective content.

30. To minimize the emissions of VOC and solvent the following work practice standards shall apply:

- a. All organic HAP and VOC containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers
- b. Spills of organic HAP or VOC containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.
- c. Organic HAP and VOC containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
- d. Mixing vessels which contain organic HAP or VOC containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
- e. Emissions of organic HAPs and VOCs must be minimized during cleaning of storage, mixing, and conveying equipment.

30-0177 – Paint mixing room

31. VOC or HAP containing cleaning solvents used around the source shall be recorded in Condition 10, Logs 1 & 2. The VOC and HAP emission from cleaning solvents will be 100 % of the respective content.

32. To minimize the emissions of VOC and solvent the following work practice standards shall apply:

- a. All organic HAP and VOC containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers
- b. Spills of organic HAP or VOC containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.
- c. Organic HAP and VOC containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
- d. Mixing vessels which contain organic HAP or VOC containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
- e. Emissions of organic HAPs and VOCs must be minimized during cleaning of storage, mixing, and conveying equipment.

(End of conditions)